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*Counsel to Canyon, Citadel, Davidson Kempner, Farallon, Sculptor, and Värde, on behalf of
themselves, and certain funds and counts managed, advised, or sub-advised by them*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Reorganized Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**APPELLANTS' STATEMENT OF
ISSUES TO BE PRESENTED ON
APPEAL AND DESIGNATION OF
RECORD ON APPEAL**

PLEASE TAKE NOTICE that, pursuant to Rule 8009 of the Federal Rules of
Bankruptcy Procedure, Canyon Capital Advisors LLC ("Canyon"), Citadel Advisors LLC
("Citadel"), Davidson Kempner Capital Management LP ("Davidson Kempner"), Farallon

Capital Management, L.L.C. (“Farallon”), Sculptor Master Fund, Ltd., Sculptor Enhanced Master Fund, Ltd., Sculptor Credit Opportunities Master Fund, Ltd., Sculptor GC Opportunities Master Fund, Ltd., Sculptor SC II, LP (collectively, “Sculptor”), and Värde Partners, Inc. (“Värde”), on behalf of themselves, and/or certain funds and accounts managed, advised, or sub-advised by them (collectively, the “RSA Noteholders” or “Appellants”), by and through their undersigned counsel, hereby submit (a) this statement of issues to be presented on appeal, and (b) a designation of items to be included in the record on appeal in connection with their appeal to the United States District Court for the Northern District of California, from the *Order Disallowing Administrative Expense Claims of Canyon Capital Advisors LLC et al.* [Bankr. Dkt. No. 9335] (the “Order”) by the United States Bankruptcy Court for the Northern District of California (the “Bankruptcy Court”), and the related *Memorandum Decision Disallowing Administrative Expense Claims* [Bankr. Dkt. No. 9333] (the “Memorandum”) entered in the above-captioned case on October 22, 2020.

I. STATEMENT OF ISSUES TO BE PRESENTED ON APPEAL

1. Whether the Bankruptcy Court erred in ruling that the RSA Noteholders’ request for allowance and payment of an administrative expense claim, pursuant to Section 503(b)(1) of the Bankruptcy Code, for damages arising out of the Debtors’ post-petition breach of the parties’ Restructuring Support Agreement, was barred, as a matter of law, by one section of the Debtors’ plan of reorganization¹ and the Bankruptcy Court’s order confirming that plan.²

¹ *Amended Chapter 11 Plan Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 Filed by Debtor PG&E Corporation* [Bankr. Dkt. No. 8048].

² *Order Confirming Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 and Notice of Order Confirming Plan* [Bankr. Dkt. No. 8053].

2. Whether the Bankruptcy Court otherwise erred in dismissing, as a matter of law, the RSA Noteholders' administrative expense claim.

II. DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD

Appellants hereby designate the items below to be included in the record on appeal, which includes all exhibits and attachments thereto and filed therewith and all documents incorporated by reference therein.

IN RE PG&E CORPORATION, ET AL. (U.S.B.C. CASE NO. 19-30088)

Date Filed	Docket No.	Docket Text
1/3/2020	5267	First Amended Motion Debtors' Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry into and Performance Under, Debt Financing Commitment Letters, and (III) Authorizing Incurrence, Payment, and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A - Proposed Order re Equity Backstop Commitment Letters # 2 Exhibit B - Proposed Order re Debt Financing Commitment Letters # 3 Exhibit C - Form of Equity Backstop Commitment Letter # 4 Exhibit D - Equity Backstop Parties # 5 Exhibit E - Conformed Copy of PG&E Corp. Debt Commitment Letter # 6 Exhibit F - Conformed Copy of Utility Debt Commitment Letter) (Rupp, Thomas). Related document(s) 4446 Motion of Debtors for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance under, Exit Financing Commitment Letters and (II) Authorizing Incurrence, Payment, and Allowance of Fee and/or Premiums, Indemnities, Costs a filed by Debtor PG&E Corporation. Modified on 1/6/2020 (dc).
1/3/2020	5268	Declaration of Kenneth S. Ziman in Support of Debtors' Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry into and Performance Under, Debt Financing Commitment Letters, and (III) Authorizing Incurrence, Payment, and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as

Date Filed	Docket No.	Docket Text
		Administrative Expense Claims (RE: related document(s)5267 Motion Miscellaneous Relief). Filed by Debtor PG&E Corporation (Rupp, Thomas)
1/27/2020	5519	Motion to Approve Document Debtors Motion Pursuant to 11 U.S.C. sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 For Entry of an Order (I) Approving and Authorizing the Debtors To Enter Into Restructuring Support Agreement With Consenting Noteholders and Shareholder Proponents, and (II) Granting Related Relief Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A - Noteholder RSA # 2 Exhibit B - Proposed Order) (Rupp, Thomas)
1/27/2020	5520	Declaration of Jason P. Wells in Support of Debtors Motion Pursuant to 11 U.S.C. sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 For Entry of an Order (I) Approving and Authorizing the Debtors To Enter Into Restructuring Support Agreement With Consenting Noteholders and Shareholder Proponents, and (II) Granting Related Relief (RE: related document(s)5519 Motion to Approve Document). Filed by Debtor PG&E Corporation (Rupp, Thomas)
1/31/2020	5590	Amended Chapter 11 Plan Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated January 31, 2020 Filed by Debtor PG&E Corporation (RE: related document(s)3841 Chapter 11 Plan filed by Debtor PG&E Corporation, 3966 Amended Chapter 11 Plan filed by Debtor PG&E Corporation, 4563 Amended Chapter 11 Plan filed by Debtor PG&E Corporation, 5101 Amended Chapter 11 Plan filed by Debtor PG&E Corporation). (Rupp, Thomas)
2/5/2020	5634	Transcript regarding Hearing Held 2/4/2020 at 10:00 AM RE: STATUS CONFERENCE RE: CONFIRMATION; DEBTORS' MOTION PURSUANT TO 11 U.S.C. SECTIONS 363(B) AND 105(A) AND FED. R. BANKR. P. 6004 AND 9019 FOR ENTRY OF AN ORDER (I) APPROVING AND AUTHORIZING THE DEBTORS TO ENTER INTO RESTRUCTURING-SUPPORT AGREEMENT WITH CONSENTING NOTEHOLDERS AND SHAREHOLDER PROPONENTS, AND (II) GRANTING RELATED RELIEF 5519. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. Until that time the transcript may be viewed at the Bankruptcy Court or a copy may be obtained from the official court transcriber

Date Filed	Docket No.	Docket Text
		eScribers, LLC; 973-406-2250. Notice of Intent to Request Redaction Deadline Due By 2/12/2020. Redaction Request Due By 02/26/2020. Redacted Transcript Submission Due By 03/9/2020. Transcript access will be restricted through 05/5/2020. (Gottlieb, Jason) Additional attachment(s) (Certificate of Service) added on 2/6/2020 (dc).
2/5/2020	5637	Order Pursuant to 11 U.S.C. Sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 (I) Approving and Authorizing the Debtors to Enter Into Restructuring Support Agreement With Consenting Noteholders and Shareholder Proponents, and (II) Granting Related Relief (Related Doc # 5519) (lp)
2/5/2020	5644	Notice Regarding / Notice of Withdrawal of Chapter 11 Plan of Reorganization Filed by the Ad Hoc Committee of Senior Unsecured Noteholders (RE: related document(s)4257 Chapter 11 Plan of Reorganization /Joint Chapter 11 Plan of Reorganization of Official Committee of Tort Claimants and Ad Hoc Committee of Senior Unsecured Noteholders Filed by Creditor Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company, Creditor Committee Official Committee of Tort Claimants (RE: related document(s)4167 Order on Motion to Extend/Limit Exclusivity Period)., 5519 Motion to Approve Document Debtors Motion Pursuant to 11 U.S.C. sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 For Entry of an Order (I) Approving and Authorizing the Debtors To Enter Into Restructuring Support Agreement With Consenting Noteholders and Shareholder Proponents, and (II) Granting Related Relief Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A - Noteholder RSA # 2 Exhibit B - Proposed Order), 5637 Order Pursuant to 11 U.S.C. Sections 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 (I) Approving and Authorizing the Debtors to Enter Into Restructuring Support Agreement With Consenting Noteholders and Shareholder Proponents, and (II) Granting Related Relief (Related Doc 5519) (lp)). Filed by Creditor Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company (Crawford, Ashley)
2/11/2020	5732	Amended Order Establishing Schedule for Disclosure Statement Approval and Plan Confirmation (RE: related document(s)5673 Order). (lp)
3/2/2020	6013	Amended Motion Debtors' Second Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment

Date Filed	Docket No.	Docket Text
		Letters, (II) Approving Terms of, and Debtors' Entry into and Performance Under, Debt Financing Commitment Letters, and (III) Authorizing Incurrence, Payment, and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims (RE: related document(s)4446 Motion Miscellaneous Relief filed by Debtor PG&E Corporation). Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Kim, Jane). Related document(s) 5267 First Amended Motion Debtors' Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry into and Performance Under, Debt Financing Commitment Letters, and (III) Authorizing Incurrence, Payment, and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims (RE: related document(s)6013 Amended Application/Motion). Filed by Debtor PG&E Corporation (Kim, Jane). Modified on 3/4/2020 (dc). (Entered: 03/03/2020)
3/3/2020	6014	Declaration of Kenneth S. Ziman in support of Debtors' Second Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry into and Performance Under, Debt Financing Commitment Letters, and (III) Authorizing Incurrence, Payment, and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims (RE: related document(s)6013 Amended Application/Motion). Filed by Debtor PG&E Corporation (Kim, Jane)
3/11/2020	6261	Notice Regarding Debtors' Second Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry into and Performance Under, Debt Financing Commitment Letters, and (III) Authorizing Incurrence, Payment, and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims (RE: related document(s)6013 Amended Motion Debtors' Second Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry into and Performance Under, Debt Financing Commitment Letters, and (III) Authorizing Incurrence, Payment, and Allowance of Related Fee and/or Premiums, Indemnities, Costs and Expenses as Administrative Expense Claims (RE: related document(s)4446 Motion Miscellaneous Relief filed by

Date Filed	Docket No.	Docket Text
		Debtor PG&E Corporation). Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A # 2 Exhibit B # 3 Exhibit C # 4 Exhibit D # 5 Exhibit E) (Kim, Jane). Related document(s) 5267 First Amended Motion Debtors' Amended Motion for Entry of Orders (I) Approving Terms of, and Debtors' Entry into and Performance Under, Equity Backstop Commitment Letters, (II) Approving Terms of, and Debtors' Entry into and Performan filed by Debtor PG&E Corporation. Modified on 3/4/2020 (dc).). Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A - Form of Equity Backstop Commitment Letter # 2 Exhibit B - Redline Comparison) (Rupp, Thomas)
3/16/2020	6321	Order (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Equity Backstop Commitment Letters and (II) Authorizing Incurrence, Payment and Allowance of Related Premiums and Expenses as Administrative Expense Claims (Related Doc # 6013) (lp)
3/17/20	6340	Order (I) Approving Proposed Disclosure Statement for Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization; (II) Approving Form and Manner of Notice of Hearing on Proposed Disclosure Statement; (III) Establishing and Approving Plan Solicitation and Voting Procedures; (IV) Approving Forms of Ballots, Solicitation Packages, and Related Notices; and (V) Granting Related Relief (Related Doc # 5835) (Attachments: # 1 Exhibits A1-A9 (Ballots) # 2 Exhibit B (Notice of Non-Voting Status) # 3 Exhibit C (Fire Victim Plan Solicitation Directive) # 4 Exhibit D (Confirmation Hearing Notice)) (lp) (Entered: 03/17/2020)
3/19/2020	6371	Corrected Transcript regarding Hearing Held 3/16/2020 RE: DEBTORS' SECOND AMENDED MOTION FOR ENTRY OF ORDERS (I) APPROVING TERMS OF, AND DEBTORS' ENTRY INTO AND PERFORMANCE UNDER, EQUITY BACKSTOP COMMITMENT LETTERS, (II) APPROVING TERMS OF, AND DEBTORS' ENTRY INTO AND PERFORMANCE UNDER, DEBT FINANCING COMMITMENT LETTERS, AND (III) AUTHORIZING INCURRENCE, PAYMENT, AND ALLOWANCE OF RELATED FEES AND/OR PREMIUMS, INDEMNITIES, COSTS AND EXPENSES AS ADMINISTRATIVE EXPENSE CLAIMS (RELATED DOCS. 4446, 5267) 6013. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. Until that time the

Date Filed	Docket No.	Docket Text
		transcript may be viewed at the Bankruptcy Court or a copy may be obtained from the official court transcriber eScribers, LLC; 973-406-2250. Notice of Intent to Request Redaction Deadline Due By 3/26/2020. Redaction Request Due By 04/9/2020. Redacted Transcript Submission Due By 04/20/2020. Transcript access will be restricted through 06/17/2020. (Gottlieb, Jason) Additional attachment(s) (Certificate of Service) added on 3/19/2020 (dc).
5/22/2020	7528	Brief/Memorandum in support of / / Plan Proponents' Joint Memorandum of Law and Omnibus Response in Support of Confirmation of Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization (RE: related document(s)7521 Amended Chapter 11 Plan). Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A - Objection Summary Chart) (Rupp, Thomas)
6/9/2020	7848	Motion / / Debtors' Motion for Entry of an Order (i) Approving Terms of, and Debtors Entry into and Performance Under, Amended Equity Backstop Commitment Documents and (ii) Authorizing Incurrence, Payment and Allowance of Related Premiums as Administrative Expense Claims Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A - Proposed Order # 2 Exhibit B - Form of Consent # 3 Exhibit C - Form of Amended Equity Backstop Commitment Letter # 4 Exhibit D - Greenshoe Backstop Term Sheet # 5 Exhibit E - Redline of Amended Equity Backstop Commitment Letter) (Rupp, Thomas)
6/9/2020	7849	Declaration of Kenneth S. Ziman in Support of Debtors' Motion for Entry of an Order (i) Approving Terms of, and Debtors Entry into and Performance Under, Amended Equity Backstop Commitment Documents and (ii) Authorizing Incurrence, Payment and Allowance of Related Premiums as Administrative Expense Claims (RE: related document(s)7848 Motion Miscellaneous Relief). Filed by Debtor PG&E Corporation (Rupp, Thomas)
6/9/2020	7863	Order Shortening Time for Hearing on Debtors' Motion for Entry of an Order (I) Approving Terms of, and Debtors' Entry Into And Performance Under, Amended Equity Backstop Commitment Documents And (II) Authorizing Incurrence, Payment And Allowance of Related Premiums As Administrative Expense Claims (Related Doc # 7848) (lp)
6/16/2020	7972	Order (I) Approving Terms of, and Debtors' Entry Into and Performance Under, Amended Equity Backstop Commitment Documents and (II) Authorizing Incurrence,

Date Filed	Docket No.	Docket Text
		Payment and Allowance of Related Premiums as Administrative Expense Claims (Related Doc # 7848) (lp)
6/17/2020	7984	Transcript regarding Hearing Held 6/16/2020 RE: DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) APPROVING TERMS OF, AND DEBTORS ENTRY INTO AND PERFORMANCE UNDER, AMENDED EQUITY BACKSTOP COMMITMENT DOCUMENTS AND (II) AUTHORIZING INCURRENCE, PAYMENT AND ALLOWANCE OF RELATED PREMIUMS AS ADMINISTRATIVE EXPENSE CLAIMS 7848. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. Until that time the transcript may be viewed at the Bankruptcy Court or a copy may be obtained from the official court transcriber eScribers, LLC; 973-406-2250. Notice of Intent to Request Redaction Deadline Due By 6/24/2020. Redaction Request Due By 07/8/2020. Redacted Transcript Submission Due By 07/20/2020. Transcript access will be restricted through 09/15/2020. (Gottlieb, Jason) Additional attachment(s) Certificate of Service added on 6/18/2020 (dc). (Entered: 06/17/2020)
6/17/2020	8001	Memorandum Decision - Confirmation of Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization (RE: related document(s)7937 Notice filed by Debtor PG&E Corporation). (lp)
6/19/2020	8048	Amended Chapter 11 Plan Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 Filed by Debtor PG&E Corporation (RE: related document(s)7521 Amended Chapter 11 Plan filed by Debtor PG&E Corporation). (Rupp, Thomas)
6/20/2020	8053	Order Confirming Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated June 19, 2020 and Notice of Order Confirming Plan (RE: related document(s)8048 Amended Chapter 11 Plan filed by Debtor PG&E Corporation). (Attachments: # 1 Exhibit A - Debtors and Shareholder Proponents Joint Plan of Chapter 11 Reorganization Dated June 19, 2020 # 2 Exhibit B - Rights Offering Procedures # 3 Exhibit C - Schedule of Pending Investigations) (lp) Additional attachment(s) Notice of Order Confirming Plan added on 6/22/2020 (dc).
7/24/2020	8536	Motion for (I) Allowance and Payment of Administrative Expense Claim and (II) to the Extent necessary, Reconsideration and Relief from the Confirmation Order Purusant to Federal Rule of Civil Procedure 60(b) (RE:

Date Filed	Docket No.	Docket Text
		related document(s)8048 Amended Chapter 11 Plan filed by Debtor PG&E Corporation, 8053 Order Confirming Chapter 11 Plan) . Filed by Interested Party Elliott Management Corporation (dc)
7/24/2020	8537	Notice of Hearing (RE: related document(s)8536 Motion for (I) Allowance and Payment of Administrative Expense Claim and (II) to the Extent necessary, Reconsideration and Relief from the Confirmation Order Purusant to Federal Rule of Civil Procedure 60(b) (RE: related document(s)8048 Amended Chapter 11 Plan filed by Debtor PG&E Corporation, 8053 Order Confirming Chapter 11 Plan) . Filed by Interested Party Elliott Management Corporation (dc)). Hearing scheduled for 8/25/2020 at 10:00 AM via Tele/Videoconference - www.canb.uscourts.gov/calendars . Filed by Interested Party Elliott Management Corporation (dc)
8/4/2020	8663	Joinder in the Pending Elliott Motion and Request for Allowance and Payment of Administrative Expense Claim Filed by Interested Partys Sculptor SC II, LP, Sculptor GC Opportunities Master Fund, Ltd., Sculptor Credit Opportunities Master Fund, Ltd., Sculptor Enhanced Master Fund, Ltd., Varde Partners, Inc., Sculptor Master Fund, Ltd., Farallon Capital Management, L.L.C., Davidson Kempner Capital Management LP, Citadel Advisors LLC, Canyon Capital Advisors LLC (Attachments: # 1 Exhibit A) (Goldblatt, Craig). Related document(s) 8536 Motion for (I) Allowance and Payment of Administrative Expense Claim and (II) to the Extent necessary, Reconsideration and Relief from the Confirmation Order Purusant to Federal Rule of Civil Procedure 60(b) filed by Interested Party Elliott Management Corporation. Modified on 8/6/2020 (dc).
8/7/2020	8704	Joinder of Pacific Investment Management Company LLC in the Pending Elliott Motion and Request for Allowance and Payment of Administrative Expense Claim (RE: related document(s)8536 Motion to Reconsider). Filed by Interested Party Pacific Investment Management Company LLC (McNeilly, Edward)
8/10/2020	8719	Transcript regarding Hearing Held 8/7/2020 RE: STATUS CONFERENCE RE MOTION OF ELLIOTT MANAGEMENT CORPORATION FOR (I) ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM AND (II) TO THE EXTENT NECESSARY, RECONSIDERATION AND RELIEF FROM THE CONFIRMATION ORDER PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 60(B) 8536.

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8/11/2020	8746	Order Regarding Scheduling with Respect to Elliott Management Corporation Motion for Allowance and Payment of Administrative Expense Claim and Related Joinders (Related Doc # 8536) (lp)
8/26/2020	8864	Brief/Memorandum in Opposition to Elliott Management Corporations Motion for Allowance and Payment of Administrative Expense Claim and Reconsideration of Confirmation Order and Related Joinders (RE: related document(s)8536 Motion to Reconsider). Filed by Debtor PG&E Corporation (Levinson Silveira, Dara)
9/14/2020	9032	Response / Elliott Management Corporation's Response to Reorganized Debtors' Initial Opposition to Motion for (I) Allowance and Payment of Administrative Expense Claim and (II) to the Extent Necessary, Reconsideration and Relief from the Confirmation Order Pursuant to Federal Rule of Civil Procedure 60(b) (RE: related document(s)8536 Motion to Reconsider, 8864 Opposition Brief/Memorandum). Filed by Interested Party Elliott Management Corporation (Tsai, Rocky)
9/14/2020	9034	Response (RE: related document(s)8536 Motion to Reconsider, 8663 Joinder, 8704 Joinder, 8864 Opposition Brief/Memorandum). Filed by Interested Partys Canyon Capital Advisors LLC, Citadel Advisors LLC, Davidson Kempner Capital Management LP, Farallon Capital Management, L.L.C., Pacific Investment Management Company LLC, Sculptor Credit Opportunities Master Fund, Ltd., Sculptor Enhanced Master Fund, Ltd., Sculptor GC Opportunities Master Fund, Ltd., Sculptor Master Fund, Ltd., Sculptor SC II, LP, Varde Partners, Inc. (Goldblatt, Craig)
9/25/2020	9143	Reply Reorganized Debtors' Reply in Support of Initial Opposition to Elliott Management Corporation's Motion for Allowance and Payment of Administrative Expense Claim

Date Filed	Docket No.	Docket Text
		and Reconsideration of Confirmation Order and Related Joinders (RE: related document(s)8864 Opposition Brief/Memorandum). Filed by Debtor PG&E Corporation (Attachments: # 1 Exhibit A) (Rupp, Thomas)
10/14/2020	9307	Transcript regarding Hearing Held 10/13/2020 RE: MOTION OF ELLIOTT MANAGEMENT CORPORATION FOR (I) ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM AND (II) TO THE EXTENT NECESSARY, RECONSIDERATION AND RELIEF FROM THE CONFIRMATION ORDER PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 60(B) 8536; REORGANIZED DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS (DUPLICATE CLAIMS). FILED BY PG&E CORPORATION 8753; REORGANIZED DEBTORS' FIFTH OMNIBUS OBJECTION TO CLAIMS (DUPLICATE CLAIMS). FILED BY PG&E CORPORATION 8759; REORGANIZED DEBTORS' SIXTH OMNIBUS OBJECTION TO CLAIMS (SATISFIED CLAIMS). FILED BY PG&E CORPORATION 8978; REORGANIZED DEBTORS' SEVENTH OMNIBUS OBJECTION TO CLAIMS (SATISFIED CLAIMS) FILED BY PG&E CORPORATION 8981; REORGANIZED DEBTORS' EIGHTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS) FILED BY PG&E CORPORATION 8983; REORGANIZED DEBTORS' NINTH OMNIBUS OBJECTION TO CLAIMS (NO LIABILITY CLAIMS) FILED BY PG&E CORPORATION 8986; REORGANIZED DEBTORS' TENTH OMNIBUS OBJECTION TO CLAIMS (PLAN PASSTHROUGH ENVIRONMENTAL CLAIMS) FILED BY PG&E CORPORATION 8988. THIS TRANSCRIPT WILL BE MADE ELECTRONICALLY AVAILABLE TO THE GENERAL PUBLIC 90 DAYS AFTER THE DATE OF FILING. Until that time the transcript may be viewed at the Bankruptcy Court or a copy may be obtained from the official court transcriber eScribers, LLC; 973-406-2250. Notice of Intent to Request Redaction Deadline Due By 10/21/2020. Redaction Request Due By 11/4/2020. Redacted Transcript Submission Due By 11/16/2020. Transcript access will be restricted through 01/12/2021. (Gottlieb, Jason) Additional attachment(s) (Certificate of Service) added on 10/15/2020 (dc).

Date Filed	Docket No.	Docket Text
10/22/2020	9333	Memorandum Decision Disallowing Administrative Expense Claims (RE: related document(s)8536 Motion to Reconsider filed by Interested Party Elliott Management Corporation, 8663 Joinder filed by Interested Party Canyon Capital Advisors LLC, Interested Party Citadel Advisors LLC, Interested Party Davidson Kempner Capital Management LP, Interested Party Farallon Capital Management, L.L.C., Interested Party Sculptor Master Fund, Ltd., Interested Party Varde Partners, Inc., Interested Party Sculptor Enhanced Master Fund, Ltd., Interested Party Sculptor Credit Opportunities Master Fund, Ltd., Interested Party Sculptor GC Opportunities Master Fund, Ltd., Interested Party Sculptor SC II, LP, 8704 Joinder filed by Interested Party Pacific Investment Management Company LLC). (lp)
10/22/2020	9334	Order Disallowing Administrative Expense Claims of Elliott Management Corporation (Related Doc # 8536) (lp)
10/22/2020	9335	Order Disallowing Administrative Expense Claims of Canyon Capital Advisors LLC et al. (RE: related document(s)8663 Joinder filed by Interested Party Canyon Capital Advisors LLC, Interested Party Citadel Advisors LLC, Interested Party Davidson Kempner Capital Management LP, Interested Party Farallon Capital Management, L.L.C., Interested Party Sculptor Master Fund, Ltd., Interested Party Varde Partners, Inc., Interested Party Sculptor Enhanced Master Fund, Ltd., Interested Party Sculptor Credit Opportunities Master Fund, Ltd., Interested Party Sculptor GC Opportunities Master Fund, Ltd., Interested Party Sculptor SC II, LP, 9034 Response filed by Interested Party Canyon Capital Advisors LLC, Interested Party Citadel Advisors LLC, Interested Party Davidson Kempner Capital Management LP, Interested Party Farallon Capital Management, L.L.C., Interested Party Sculptor Master Fund, Ltd., Interested Party Varde Partners, Inc., Interested Party Sculptor Enhanced Master Fund, Ltd., Interested Party Sculptor Credit Opportunities Master Fund, Ltd., Interested Party Sculptor GC Opportunities Master Fund, Ltd., Interested Party Sculptor SC II, LP, Interested Party Pacific Investment Management Company LLC). (lp)
10/22/2020	9336	Order Disallowing Administrative Expense Claims of Pacific Investment Management Company LLC (RE: related document(s)8704 Joinder filed by Interested Party Pacific Investment Management Company LLC, 9034 Response filed by Interested Party Canyon Capital Advisors

Date Filed	Docket No.	Docket Text
		LLC, Interested Party Citadel Advisors LLC, Interested Party Davidson Kempner Capital Management LP, Interested Party Farallon Capital Management, L.L.C., Interested Party Sculptor Master Fund, Ltd., Interested Party Varde Partners, Inc., Interested Party Sculptor Enhanced Master Fund, Ltd., Interested Party Sculptor Credit Opportunities Master Fund, Ltd., Interested Party Sculptor GC Opportunities Master Fund, Ltd., Interested Party Sculptor SC II, LP, Interested Party Pacific Investment Management Company LLC). (lp)
11/4/2020	9398	Notice of Appeal to District Court , Fee Amount \$ 298. (RE: related document(s)9333 Memorandum Decision, 9334 Order on Motion to Reconsider). Appellant Designation due by 11/20/2020. Statement of Issues due by 11/20/2020. Transmission of Record to District Court due by 12/4/2020. Filed by Interested Party Elliott Management Corporation (Tsai, Rocky)
11/4/2020	9403	Notice of Appeal to District Court , Fee Amount \$ 298. (RE: related document(s)9333 Memorandum Decision, 9335 Order). Appellant Designation due by 11/20/2020. Statement of Issues due by 11/20/2020. Transmission of Record to District Court due by 12/4/2020. (Attachments: # 1 Exhibit A - Order Disallowing Administrative Expense Claims # 2 Exhibit B - Memorandum Decision) Filed by Interested Partys Canyon Capital Advisors LLC, Citadel Advisors LLC, Davidson Kempner Capital Management LP, Farallon Capital Management, L.L.C., Sculptor Credit Opportunities Master Fund, Ltd., Sculptor Enhanced Master Fund, Ltd., Sculptor GC Opportunities Master Fund, Ltd., Sculptor Master Fund, Ltd., Sculptor SC II, LP, Varde Partners, Inc. (Anker, Philip)
11/4/2020	9405	Notice of Appeal and Statement of Election to Have Appeal Heard by District Court, Fee Amount \$ 298. (RE: related document(s)9333 Memorandum Decision, 9336 Order). Appellant Designation due by 11/20/2020. Transmission of Record to District Court due by 12/4/2020. Statement of Issues due by 11/20/2020. Filed by Interested Party Pacific Investment Management Company LLC (McNeilly, Edward)

Appellants reserve the right to amend, modify, and/or supplement the foregoing issues and designations.

1 **III. CERTIFICATE REGARDING TRANSCRIPTS**

2 Pursuant to Rule 8009(b)(1)(B) of the Federal Rules of Bankruptcy Procedure,
3 Appellants hereby file this certificate stating that Appellants are not ordering any transcripts. All
4 transcripts have been prepared, are filed on the docket and are designated in the foregoing
5 designation of record.
6

7
8 Dated: November 18, 2020

/s/ Philip D. Anker

Philip D. Anker (*Pro Hac Vice* admitted)

Allyson Pierce (Cal. Bar No. 325060)

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Kempner, Farallon, Sculptor, and Värde, on
behalf of themselves, and certain funds and
counts managed, advised, or sub-advised by
them*